

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

THIS DOCUMENT RELATES TO:)

All Cases)

)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**Notice of Stipulation of Extension of Time for
Tennessee Clinic Defendants to Respond to
PSC'S MOTION FOR QUALIFIED PROTECTIVE ORDER CONCERNING
PRODUCTION OF CERTAIN INFORMATION
MAINTAINED BY THIRD PARTY PAYORS [Dkt. 2629]**

Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Specialty Surgery Center, PLLC; Kenneth Lister, MD, PC; Kenneth R. Lister, MD; and Donald Jones, MD (collectively "the Tennessee Clinic Defendants") hereby give notice to this honorable Court and all parties that, consistent with MDL Order No. 11 [Dkt. 1524], the Tennessee Clinic Defendants and the PSC (two of the "Impacted Parties" with regard to this Motion) have agreed that the Tennessee Clinic Defendants shall have through February 26, 2016, to file a written response to *PSC's Motion for Qualified Protective Order Concerning Production of Certain Information Maintained by Third Party Payors*, filed February 5, 2016 [Dkt. 2629]. This is the first extension for response to this Motion. The parties are meeting and conferring, and they expect to resolve the issues raised in the Motion.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

C.J. Gideon, Jr.*

Chris J. Tardio*

Alan S. Bean**

Matthew H. Cline*

315 Deaderick Street, Suite 1100

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (615) 254-0459

chris@gideoncooper.com

***Attorneys for the Tennessee Clinic
Defendants***

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 19th day of February, 2016.

/s/ Chris J. Tardio

Chris J. Tardio